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April 1, 2022

The Honorable Maryellen Noreika  
U.S. District Court  
844 N. King Street  
Unit 19, Room 4324  
Wilmington, DE 19801-3555

**Re: CBV, Inc. v. ChanBond, LLC, et al., C.A. No. 1:21-cv-01456-MN**

Dear Judge Noreika,

I write on behalf of Defendants Deirdre Leane and IPNAV, LLC (collectively, the "Leane Defendants"). I write to apprise the Court that on March 31, 2022, the Leane Defendants served written responses and completed their document production in response to Plaintiff CBV, Inc.'s document requests, referred to in the March 31, 2022 Stipulation and [Proposed] Order Regarding Preliminary Injunction Briefing (the "PI Briefing Stipulation," D.I. 52) as the "Expedited Discovery Requests."

Consistent with Paragraph 3 of the PI Briefing Stipulation, because the Leane Defendants completed their production in response to the Expedited Discovery Requests, CBV's reply brief in further support of its motion for preliminary injunction (the "PI Motion") is due within seven days of March 31, 2022, namely by Thursday, April 7, 2022. Because the parties entered into a stipulation (D.I. 32) restraining ChanBond's distribution of proceeds pending the hearing of this motion, we ask the Court to

The Honorable Maryellen Noreika  
April 1, 2022  
Page 2



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schedule any hearing<sup>1</sup> on the motion with the same urgency on which it would schedule such a hearing after granting a contested TRO motion.

Counsel are available should the Court have any questions.

Respectfully submitted,

*/s/ James H. S. Levine*

James H.S. Levine (#5355)

JHSL/kw

cc: All counsel of record

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<sup>1</sup> The Leane Defendants will formally request oral argument pursuant to Local Rule 7.1.4 after CBV files its reply brief.